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FCC Mail Room

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

1. Date filed: February 2, 2010
2. Name of company(s) covered by this certification: Coast to Coast Cellular, Inc.
3. Form 499 Filer ID: 826475
4. Name of signatory: J. William Riner
5. Title of signatory: CEO
6. Certification:

I, J. William Riner, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed J. William Riner [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

No. of Copies rec'd 0+4
List ABCDE

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Coast To Coast Cellular Inc. (C2C)
Statement of CPNI Procedures
2009

- 1) All customer service representatives have been instructed on the requirements for the use of CPNI information. (Section 64.2001-2011)
- 2) Copies of Section 64.2001-2011 are situated at each terminal for support reference and support at all times.
- 3) C2C customer service representatives do not initiate sales and marketing campaigns of any sort. They are there for our current customer base only. Since our only business is cellular phone service, the need for other products and services sales campaigns are not necessary. We do not allow any use of CPNI information to anyone other than our own customer service reps in the direct communication with the actual customer.
- 4) All customers that have online access to their account have password protection and cannot access information in any other way.
- 5) Any breach of these rules or discovery of an attempt to breach these rules are to be reported to the Customer Service Manager and the Compliance Officer. In turn, after verification of the breach, the procedures of 64.2011 are initiated. Any breach by an employee can subject them to disciplinary action.

CPNI Employee Disciplinary Process 2009

CPNI (Customer Proprietary Network Information) must be kept confidential in all circumstances except as allowed in 47 CFR 64.2001-2011.

As required by 47 CFR 64.2009 all carriers are to have an express disciplinary process in place to help safeguard the use of CPNI.

Therefore Coast To Coast has implemented the following policy:

- 1) First occurrence of any CPNI improperly disclosed to an unauthorized person/organization will require the employee to undergo further training on the rules and regulations of safeguarding CPNI.
- 2) Second occurrence of a violation will be met with a reprimand and additional training on the rules and regulations.
- 3) If a third occurrence happens, a one day suspension will be applied.